

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV

Signed

IN THE MATTER OF:

CHEMTRONICS SITE

Northrop Corporation
1800 Century Park East
Los Angeles, CA

Chemtronics, Inc.
180 Old Bee Tree Road
Swannanoa, NC

Respondents.

Docket No.

Proceeding Under Section 106(a)
of the Comprehensive Environ-
mental Response, Compensation,
and Liability Act of 1980
(42 U.S.C. § 9606(a))

ADMINISTRATIVE ORDER ON CONSENT

I. JURISDICTION

This Administrative Order on Consent (Consent Order) is entered into by Chemtronics, Inc. (Chemtronics), Northrop Corporation (Northrop), (Respondents), and the United States Environmental Protection Agency (EPA), pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. § 9609(a), and delegated to the Administrator of EPA by Executive Order 12316 dated August 14, 1981, 46 Federal Register 42237 (1981) and further delegated to the Regional Administrator of Region IV, EPA.

The Respondents agree to undertake all actions required by the terms and conditions of this Consent Order. The Respondents consent to and will not contest EPA jurisdiction regarding this Consent Order. Respondents neither admit nor deny the Findings of Fact herein; however, Respondents agree not to challenge these findings for purposes of this Consent Order. The Respondents reserve all rights they may have to object to or contest any allegation of violation of this Consent Order.



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1.1. STATEMENT OF PURPOSE

In entering into this Consent Order, the mutual objectives of EPA, Northrop, and Chemtronics are: (1) to determine fully the nature and extent of the threat to the public health or welfare or the environment caused by the release or threatened release of hazardous substances, pollutants, or contaminants from the Chemtronics Site (Remedial Investigation), and (2) to evaluate alternatives for the appropriate extent of remedial action to prevent or mitigate the migration or the release or threatened release of hazardous substances, pollutants, or contaminants from the Chemtronics Site (Feasibility Study), if any such remedial action is required. The activities conducted pursuant to this Consent Order are subject to approval by EPA and shall be consistent with the National Contingency Plan, 40 C.F.R. Part 300.68(a)-(j) (47 Federal Register 31180 (July 16, 1982), revised at 48 Federal Register 40658 (September 8, 1983)).

III. FINDINGS OF FACT, DETERMINATIONS, AND CONCLUSIONS OF LAW

EPA has determined that all findings of fact necessary for the issuance of this Consent Order pursuant to Section 106(a) of CERCLA have been made and are outlined below.

- A. The Chemtronics Site is approximately 1,027 acres and located at 180 Old Bee Tree Road in a rural area of the township in Swannanoa, Buncombe County, North Carolina, at coordinates 35°37'0.3"N latitude and 085°26'015"W longitude (hereinafter "Site"). Waste disposal via burning, evaporation, neutralization and landfilling reportedly occurred over only a small portion of the Site. The exact size of the various disposal areas will be determined by the remedial investigation.
- B. The Site is a facility within the meaning of Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).
- C. Respondent Northrop is a Delaware corporation, whose wholly owned subsidiary Northrop Carolina, Inc., manufactured chemicals and explosives on the Site from 1965-1971.
- D. Respondent Chemtronics, Inc. is a North Carolina corporation that produced thermally stable explosive and speciality chemicals on the Site and currently owns the Site.
- E. The Respondents are persons as defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21), and as generators of hazardous substances, are responsible parties under Section 107(a)(3) of CERCLA, 42 U.S.C. § 9607(a)(3).
- F. The Site is on the National Priorities List as defined in Section 105 of CERCLA, 42 U.S.C. § 9605.

- G. Personnel from EPA, Surveillance and Analysis Division (SAD) conducted a hazardous waste site investigation at the Chemtronics Site on June 2-5, 1980. During the investigation, six waste pits, six monitoring wells, and seven stream stations were sampled. This analytical data, along with data collected by Chemtronics is presented in the Remedial Investigation/Feasibility Study Work Plan attached hereto and incorporated herein as ATTACHMENT ONE.
- H. The organic compounds and metals found in the soil, groundwater, and surface streams as described in paragraph G and Attachment One are "hazardous substances" within the meaning of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
- I. The presence of hazardous substances at the Site, their past and potential migration in soils, groundwater and surface streams, constitutes both an actual release and threatened release within the meaning of Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).
- J. Exposure to said hazardous substances may cause illness, disease, death or other harmful effects to plant, animal life, and humans.
- K. All surface drainage from the Site flows to Beetree Creek which flows into the Swannanoa River. The recreational uses of these bodies of water may be adversely affected.
- L. The drinking water supply of those persons in the area served by private and public water supply wells, may be adversely affected.

Based on the information outlined above, EPA has determined that because of an actual or threatened release of hazardous substances from the Site, there may be an imminent and substantial endangerment to the public health or welfare or the environment. EPA has also determined that the actions required by this Consent Order must be taken to protect public health and welfare and the environment. Such actions shall include, but will not necessarily be limited to, a Remedial Investigation and Feasibility Study which is the subject of this Consent Order.

IV. PARTIES BOUND

This Consent Order shall apply to and be binding upon the Respondents and EPA, their agents, successors, and assigns and upon all persons, contractors and consultants acting under or for either the Respondents or EPA or both in connection with this Consent Order.

No change in ownership or corporate or partnership status relating to the Site will in any way alter the status of the Respondents under this Consent Order or in any way alter the Respondents' responsibility under this Consent Order. The Respondents will remain the Respondents under this Consent Order and will be responsible for carrying out all activities required of the Respondents under this Consent Order.

The Respondents shall provide a copy of this Consent Order to all contractors, sub-contractors, laboratories, and consultants retained to conduct any portion of the work performed pursuant to this Consent Order within fourteen (14) calendar days of the effective date of this Consent Order or date of such retention, whichever is applicable.

V. NOTICE TO THE STATE

The requirement of Section 106(a) of CERCLA to notify the State of North Carolina has been satisfied.

VI. WORK TO BE PERFORMED

All response work performed pursuant to this Consent Order shall be under the direction and supervision of a qualified professional engineer or a certified geologist with expertise in hazardous waste site investigation, and remediation. Prior to the initiation of the remedial investigation, the Respondents shall notify EPA in writing regarding the identity of such engineer or geologist and of any contractors and/or subcontractors to be used in carrying out the terms of this Consent Order.

Based on the foregoing, it is hereby AGREED TO AND ORDERED that the following work shall be performed:

- A. The Respondents shall implement the tasks detailed in the Remedial Investigation and Feasibility Study Work Plan (RI/FS Work Plan) which has been approved by EPA and is attached to and incorporated in this Consent Order (Attachment One). This work shall be conducted in accordance with EPA Remedial Investigation and Feasibility Study guidance documents (EPA/540/G-85/002 (June 1985) and EPA/540/G-85/003 (June 1985)).
- B. Within seven calendar days of the effective date of this Consent Order the Respondents shall commence Task 1 of the RI/FS Work Plan.
- C. The Respondents, through their contractor, shall provide monthly written progress reports to EPA according to the schedule contained in the RI/FS Work Plan. At a minimum

these progress reports shall: (1) describe the actions during the period which have been taken toward achieving compliance with this Consent Order, (2) include a narrative description of site activities and data received by the Respondents during the period, and (3) include all plans and procedures completed subsequent to EPA approval of the RI/FS Work Plan during the past month, as well as such actions, data, and plans which are scheduled for the next month. These reports are to be submitted to EPA by the tenth day of each month following the effective date of this Consent Order.

- D. The Respondents shall provide preliminary and final reports to EPA according to the schedule contained in the RI/FS Work Plan. The Respondents shall also provide milestone or decision point reports as called for in the RI/FS Work Plan and include with such reports all verified results of sampling and testing pertaining to the subject of the report. Verified as used herein means that the results of sampling have been reviewed pursuant to the procedures of the Quality Assurance Program Plan.
- E. EPA shall review the preliminary and final reports and within 30 calendar days of receipt by EPA of such reports, EPA shall notify the Respondents in writing of EPA's approval or disapproval of these reports or any part thereof. In the event of any disapproval, EPA shall specify in writing both the deficiencies and the reasons for such disapproval.
- F. Within 30 calendar days of receipt of EPA notification of preliminary or final report disapproval, the Respondents shall amend and submit to EPA such revised reports for EPA review. In the event of disapproval, EPA retains the right to amend such reports, to perform additional studies, and to conduct a complete Remedial Investigation and Feasibility Study pursuant to its authority under CERCLA.
- G. Documents, including reports, approvals, and other correspondence, to be submitted pursuant to this Consent Order, shall be sent by certified mail to the following addresses or to such other addresses as the Respondents or EPA hereafter may designate in writing:
 - 1) Documents to be submitted to EPA should be sent (5 copies) to:

Jon K. Bornholm
Remedial Project Officer
U.S. Environmental Protection Agency
Region IV
345 Courtland St. - NE
Atlanta, GA 30365

- 2) Documents to be submitted to the Respondents should be sent to:

John F. Schultheis
President
Chemtronics, Inc.
180 Old Bee Tree Road
Suwannea, N.C. 28778

- H. In addition to the EPA-approved tasks and deliverables to be completed pursuant to this Consent Order, including Task 9.0 of the RI/FS Work Plan, Respondents or EPA may determine that additional tasks, including remedial investigatory work and/or engineering evaluation, may be necessary as part of the RI/FS. Upon written agreement of the parties hereto, this Consent Order may be amended as necessary to address such further investigation or study as is not currently addressed in the RI/FS Work Plan but is necessary to adequately investigate the Site and land formerly part of the Northrop parcel of property which includes the site.
- I. Wherever pursuant to this Consent Order, the RI/FS Work Plan or other incorporated documents, EPA approval is required, such approval will not be arbitrarily and capriciously withheld.
- J. It has been alleged that wastes from the CS process were disposed of at the former municipal landfills now known as the Tropigas Property and Beacon Hill. Without admission and without waiver of any defenses or arguments regarding their own liability with regard to such alleged disposal, Respondents agree to perform, with regard to each landfill, the work set forth below if it is established that the landfill was in use during the period when either Respondent owned or operated the Chemtronics Site and there is credible evidence (made available to Respondents) that disposal operations for the Chemtronics Site took place at the landfill during that period.

If directed to do so by EPA, Respondents will make three four-inch soil borings to the bottom of the fill in each of these landfills at locations to be designated by EPA. The Respondents further agree to have composite samples from each of the cores recovered by each boring analyzed for CS, CS-1 and CS-2 and to report the verified results of such analyses to EPA. Split samples from each core composite will also be provided to EPA. All samples analyses shall be carried out in accordance with Section VIII of this Consent Order and the Chemtronics Site Quality Assurance Program Plan.

Under this Consent Order, Respondents shall not be required to perform any further investigation, analyses, work or study with regard to these former municipal landfills. With regard to these former municipal landfills, EPA expressly reserves its rights as set forth in Section XIII herein.

VII. DESIGNATED PROJECT COORDINATORS

On or before the effective date of this Consent Order, EPA and the Respondents shall each designate a Project Coordinator. Each Project Coordinator shall be responsible for overseeing the implementation of this Consent Order. To the maximum extent possible, communications between the Respondents and EPA and all documents; including reports, approvals, and their correspondence, concerning the activities performed pursuant to the terms and conditions of this Consent Order; shall be directed through the Project Coordinators.

EPA and the Respondents each have the right to change their respective Project Coordinator. Such a change shall be accomplished by notifying the other party in writing at least five calendar days prior to the change.

The EPA Project Coordinator shall have the authority vested in the On-Scene-Coordinator by the National Contingency Plan; 40 C.F.R. Part 300 et seq. 47 Federal Register 31180, July 16, 1982. This includes the authority to halt, conduct, or direct any tasks required by this Consent Order and/or any response actions or portions thereof when conditions present an immediate risk to public health or welfare or the environment.

Neither the absence of the EPA Project Coordinator from the Site nor the lack of availability of an EPA representative by phone shall be cause for the stoppage of work except where the approval or concurrence of such coordinator or EPA is necessary for a particular item of work to continue or be completed.

VIII. QUALITY ASSURANCE

The respondents shall use quality assurance, quality control, and chain of custody procedures in accordance with the Region IV, USEPA, Surveillance and Analysis Division, College Station Road, Athens, Georgia, Water Surveillance Branch, Standard Operating Procedures and Quality Assurance Manual (August 29, 1980, Draft) throughout all sample collection and analysis activities. This manual shall be provided to the Respondents by EPA. The Respondents shall consult with EPA in planning for, and prior to, all sampling and analysis as detailed in the RI/FS Work Plan. The Respondents shall ensure that EPA personnel are allowed reasonable access to the laboratory utilized by the Respondents for analysis of samples collected pursuant to this Consent Order. In order to provide quality assurance and maintain quality control regarding all samples collected pursuant to this Consent Order, the Respondent shall:

- A. Ensure that the laboratory(s) utilized by the Respondents for analyses perform such analyses according to EPA methods or methods deemed satisfactory to EPA and submit all protocols to be used for analyses to EPA at least 14 calendar days prior to the commencement of analysis.

- B. Ensure that laboratory(s) utilized by the Respondent for analyses participate in an EPA quality assurance/quality control program equivalent to that which is followed by EPA and which is consistent with EPA document QAMS-005/80. As part of such a program, and upon request by EPA, such laboratory(s) shall perform analyses of samples provided by EPA to demonstrate the quality of each laboratory's analytical data. A maximum annual number of four per analytical combination; e.g., four aqueous samples by Gas Chromatography/Mass Spectrometry, four soil/sediment samples by Gas Chromatography/Mass Spectrometry, etc., may be provided to each laboratory for analysis.

IX. SITE ACCESS

To the extent that areas covered by the Work Plan are presently owned by parties other than those bound by this Consent Order, the Respondents have obtained or will use their best efforts to obtain site access agreements from the present owners within 30 calendar days of the effective date of this Consent Order. Such agreements shall provide reasonable access to EPA and/or their authorized representatives. In the event that site access agreements are not obtained within the time referenced above, the Respondents shall notify EPA regarding the lack of, and efforts to obtain such agreements within 30 calendar days of the effective date of this Consent Order. As to any area to which a site access agreement or site access for Respondents cannot be obtained, Respondents are relieved of any requirement under this Consent Order or the RI/FS Work Plan to perform the work called for in such area. EPA reserves the right to seek recovery from responsible parties of any costs incurred by it in carrying out any such work.

X. SAMPLING, ACCESS, AND DATA/DOCUMENT AVAILABILITY

In addition to the reports required pursuant to Section VI-D of this Consent Order, the Respondents shall make the verified results of all sampling and/or tests or other data generated by the Respondents or on the Respondents' behalf, with respect to the implementation of this Consent Order, available to EPA upon request. EPA will make available to the Respondents the verified results of sampling and/or tests or other data similarly generated by EPA.

At the request of EPA, the Respondents shall allow split or duplicate samples to be taken by EPA and/or their authorized representatives, of any samples collected by the Respondents pursuant to the implementation of this Consent Order. The results of analyses of all split samples, "blanks" and "spikes" shall be presented to EPA in the form of a CLP data package. The Respondents shall notify EPA not less than 72 hours in advance of any sample collection activity except in the event of post-storm even sampling, in which case the best possible advance notice will be given. EPA shall endeavor to notify Respondents not less than 72

hours in advance of any EPA sample collection activity and shall allow split or duplicate samples to be taken by the Respondents or their authorized representatives.

EPA and/or their authorized representative shall have the authority to enter and freely move about all property at the Site at all reasonable times for the purposes of, inspecting records, operating logs, and contracts generated pursuant to this Consent Order; reviewing the progress of the Respondents in carrying out the terms of this Consent Order; conducting such tests as EPA or the Project Coordinator deem necessary; and verifying the data submitted to EPA by the Respondents. The Respondents shall permit such persons to inspect and copy all records, files, photographs, documents, and other writings (including all sampling and monitoring data) generated pursuant to this Consent Order. Such materials will be kept in a designated location on the Site. All parties with access to the Site pursuant to this paragraph shall comply with the site owner's security requirements (Chemtronics Security Manual) and all approved health and safety plans applicable to those areas of the site where remedial investigatory activities are being conducted. The above language notwithstanding, Respondents shall make available to EPA for inspection and copying, any and all documentary or other evidence to which it is entitled under the provisions of CERCLA.

The Respondents may assert a confidentiality claim, if appropriate, covering part or all of the information requested by, or required to be preserved by, this Consent Order pursuant to 40 C.F.R. § 2.203(h). Such an assertion shall be adequately substantiated when the assertion is made. Analytical data which is directly related to or arising out of the environmental conditions at the site shall not be claimed as confidential by the Respondents. Information determined to be confidential by EPA will be afforded the protection specified in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is submitted to EPA it may be made available to the public by EPA without further notice to the Respondents.

XI. RECORD PRESERVATION

EPA and the Respondents agree that each shall preserve during the pendency of this Consent Order and for a minimum of six (6) years after its termination, all records and documents in their possession or in the possession of their divisions, employees, agents, accountants, contractors, or attorneys which constitute or relate to work generated pursuant to this Consent Order or which relate directly to the disposal of hazardous substances at the Site despite any document retention policy to the contrary. After this six year period, the Respondents shall notify EPA within 30 calendar days prior to the destruction of any such documents. Upon request by EPA, the Respondents shall make available to EPA such records or copies of such records.

Additionally, if E requests that some or all documents be preserved for a longer period, the Respondents shall comply with such request.

XII. DISPUTES

If the Respondents object to any EPA notice of disapproval or decision made pursuant to this Consent Order, the Respondents shall notify EPA in writing of its objections within fourteen (14) days of receipt of the decision. EPA and the Respondents then have an additional fourteen (14) days from the receipt by EPA of the notification of objection to reach agreement. If agreement cannot be reached on any issue within this fourteen (14) day period, EPA shall immediately provide a written statement of its decision to the Respondents.

XIII. DELAY IN PERFORMANCE

Respondent shall implement the tasks detailed in the Work Plan. Respondent shall be permitted to extend the time schedule set forth in Attachment One only to the extent that the delay is caused by reasons entirely beyond the control of Respondent or the control of any entity controlled by or under common control of Respondent. Increased cost shall not be considered a reason beyond the control of Respondent. In any event, the burden of establishing a basis for an extension shall be exclusively on Respondent.

If Respondents fail to achieve any deadline set forth in this Consent Order, or RI/FS Work Plan, they shall submit a written report by certified mail to EPA. Such report shall be submitted within three (3) working days following the missed deadline, and shall include:

- (a) An explanation for the failure to meet the deadline;
- (b) The measures taken and to be taken by Respondents to minimize the delay;
- (c) The timetable by which those measures will be implemented which will not be beyond the period of time reasonably necessary for completion of those activities on an expedited schedule calculated to minimize the delay;
- (d) Any documentation relevant to 2(a) through 2(c).

EPA will respond in writing to any report by Respondents pursuant to Paragraph 2 of this Section by indicating whether EPA approves Respondents' proposed date or time period for completion of the delayed activities. EPA's written approval will be deemed to be incorporated into this Consent Order. If EPA does not so approve, EPA will so state in writing, and also state the date by which, or the time period within which, Respondents shall achieve the tasks as to which the deadline applied, which written

response shall be deemed to be incorporated into this Consent Order. Respondent failure to comply with the schedule as incorporated under this paragraph may be construed to be a violation of this Consent Order which may subject Respondents to a civil penalty of not more than \$5,000 for each day in which violations occur or in which such failure to comply continues.

Failure to comply with this Consent Order or any portion thereof, without sufficient cause, may also subject the Respondents to liability for damages in the amount of three times the total of all costs incurred by the government as a result of Respondents' failure to take proper action.

XIV. RESERVATION OF RIGHTS

Notwithstanding compliance with the terms of this Consent Order, including the completion of an EPA approved Remedial Investigation and Feasibility Study, the Respondents are not released from liability, if any, for any actions beyond the terms of this Consent Order taken by EPA respecting the Site. EPA reserves the right to take any enforcement action pursuant to CERCLA and/or any available legal authority, including the right to seek injunctive relief, monetary penalties, and punitive damages for any violation of law or this Consent Order, including any rights EPA may have with regard to other responsible parties.

The Respondents, and EPA expressly reserve all rights and defenses that they may have, including EPA's right both to disapprove of work performed by the Respondents which is not performed in accordance with the RI/FS Work Plan, and to request agreement of the Respondents to perform tasks in addition to those detailed in the RI/FS Work Plan, as provided in this Consent Order. In the event that the Respondents decline to perform any additional and/or modified tasks, EPA will have the right to undertake any remedial investigation and/or feasibility study work. In addition, EPA reserves the right to undertake removal actions and/or remedial actions, other than those required by this Consent Order, at any time. In either event, EPA reserves the right to seek reimbursement from the Respondents or any other responsible party thereafter for such costs incurred by the United States or the State of North Carolina.

The Respondents reserve any rights they may have to withhold any document or record which is attorney-client or attorney work product privileged under Federal, State or common law and will provide EPA instead with a description of such material and substantiation of the claim of privilege. Notwithstanding any other provision herein, EPA reserves all rights it may have to seek to compel the production of any materials so withheld.

EPA reserves the right to bring an action against the Respondents and/or any other responsible party pursuant to Section 107 of CERCLA for recovery of all response and oversight costs incurred by the United States and the State of North Carolina related to this Consent Order as well as any other past and future costs incurred by the United States and the State of North Carolina in connection with response activities conducted pursuant to CERCLA at this site.

XVI. OTHER CLAIMS

Nothing herein is intended to release any claims, causes of action or demands in law or equity that EPA and/or Respondents may have against each other, any person, firm, partnership, corporation or agency or department of the government not a signatory to this Consent Order for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous wastes, pollutants or contaminants found at, taken to, or taken from the Site.

This Consent Order does not constitute any decision on pre-authorization of funds under Section 111(a)(2) of CERCLA.

XVII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to this Consent Order shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations unless an exemption from such requirements is specifically provided herein.

EPA shall not issue an order under Section 3008 of the Resource Conservation and Recovery Act regarding this site until this Consent Order is terminated.

XVIII. LIABILITY OF EPA

Neither the United States Government nor any agency, or agents or employees thereof shall be liable for any injuries or damages to persons or property resulting from acts or omissions of Respondents, their officers, directors, employees, agents, servants, receivers, trustees, successors, or assignees, or any persons, including but not limited to firms, corporations, subsidiaries, contractors or consultants, in carrying out activities pursuant to this Consent Order, nor shall the United States Government or any agency, or agents or employees thereof be held out as a party to any contract entered into by the Respondents in carrying out activities pursuant to this Consent Order.

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XIX. PUBLIC COMMENT

Upon submission to EPA of an approved Feasibility Study Final Report, EPA shall make such Feasibility Study Final Report available to the public for review and comment for, at a minimum, a twenty-one (21) day period, pursuant to EPA's Community Relations Policy. Following the public review and comment period, EPA shall notify the Respondents which remedial action alternative is approved for the site. EPA's final selection and approval of a remedial action alternative shall constitute a Record of Decision for the site.

XX. EFFECTIVE DATE AND SUBSEQUENT MODIFICATION

The effective date of this Consent Order shall be the date on which it is signed by EPA. In consideration of communications between the Respondents and EPA concerning the terms of this Consent Order, the Respondents waive any rights they may have to confer with EPA prior to the effective date of this Consent Order.

This Consent Order may be amended by mutual agreement of EPA and the Respondents. Such amendments shall be in writing and shall have as the effective date, that date on which such amendments are signed by EPA.

The RI/FS Work Plan and those reports, plans, specifications, schedules, and attachments required by this Consent Order and prepared by Respondents are, upon approval by EPA, incorporated into this Consent Order.

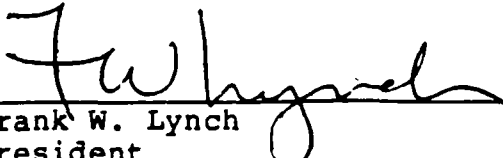
No informal advice, guidance, suggestions, or comments by EPA regarding reports, plans, specifications, schedules, and any other writing submitted by the Respondents will be construed as relieving the Respondents of their obligation to obtain such formal approval as may be required by this Consent Order.

XXI. TERMINATION AND SATISFACTION

The provisions of this Consent Order shall be deemed satisfied upon the Respondents' receipt of written notice from EPA that the Respondents have demonstrated, to the satisfaction of EPA, that all of the terms of this Consent Order, including any additional tasks agreed upon by EPA and Respondents have been completed.

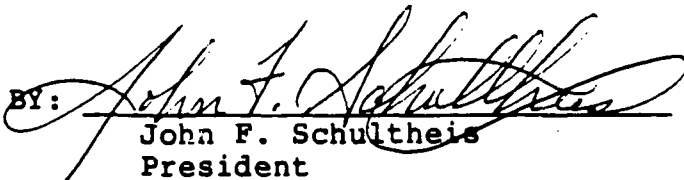
IT IS SO AGREED AND ORDERED:

BY:


Frank W. Lynch
President
NORTHROP CORPORATION

18 Sept 85
Date

BY:


John F. Schultheis
President
CHEMTRONICS, INC.

16 Sept. 1985
Date

/s/ Jack E. Ravan
Regional Administrator

BY:

Jack E. Ravan
Regional Administrator
Region IV
U.S. ENVIRONMENTAL PROTECTION
AGENCY

OCT 21 1985

Date